

**Connell Foley LLP**

One Newark Center  
1085 Raymond Boulevard, 19th Floor  
Newark, New Jersey 07102  
973-436-5800  
Attorneys for Plaintiff, Wingate Inns International, Inc.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

WINGATE INNS INTERNATIONAL, INC., a  
Delaware Corporation,

Plaintiff,

vs.

UNIVERSAL HOSPITALITY SOLUTIONS, LLC,  
an Arizona limited liability company; and SCOTT  
NADEL, an individual,

Defendant.

Civil Action No. 2:21-cv-19809

**AFFIDAVIT OF EFFECTUATED  
SERVICE AS TO DEFENDANT  
UNIVERSAL HOSPITALITY  
SOLUTIONS, LLC ONLY**

BRYAN P. COUCH, of full age, hereby certifies and states:

1. I am an attorney-at-law of the State of New Jersey and a partner of the law firm of Connell Foley LLP, attorneys for plaintiff, Wingate Inns International, Inc. ("WII"), in the above captioned matter. As such, I have personal knowledge of the facts contained herein.

2. The Complaint was filed with the Court on November 5, 2021. (See Document No. 1.)

3. On November 8, 2021, we forwarded the Summons and Complaint to Recon Management Group ("Recon") to effectuate personal service upon defendant Universal Hospitality Solutions, LLC.

4. Despite diligent efforts and inquiry, Recon has been unable to personally serve defendant Universal Hospitality Solutions, LLC. (A true copy of Recon's Affidavit of Diligent Efforts is attached hereto as Exhibit A.)

5. By letter dated January 5, 2022, WII served defendant Universal Hospitality Solutions, LLC with a copy of the Summons and Complaint via regular and certified, mail return receipt requested pursuant to Fed. R. Civ. P. 4(e)(1). (A true copy of which is attached hereto as Exhibit B.)

I certify under penalty of perjury that the foregoing is true and correct.



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Bryan P. Couch

Dated: January 7, 2022  
Newark, New Jersey

# EXHIBIT A

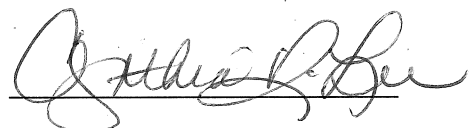
**Affidavit of Diligent Efforts as to Universal Hospitality Solutions, LLC**

Re: Wingate Inns International, Inc. vs. Universal Hospitality Solutions, LLC, et al

1. Affiant, Cynthia R. Lee, is an employee of RECON Management Group, LLC and makes this affidavit on information and belief on January 4, 2022.
2. Affiant assumed responsibility of this file on November 9, 2021 and proceeded with preliminary research to locate a current address for Universal Hospitality Solutions, LLC.
3. Based on a review of the file, extensive research and data received and processed, as well as client-supplied data, Affiant obtained information that Universal Hospitality Solutions, LLC is a Limited Liability Company organized under the laws in the State of Arizona with a business address of 7702 E. Doubletree Rd., Suite 300 in Scottsdale, Arizona 85258. Upon further research, Scott Nadel, a Member of Universal Hospitality Solutions, LLC and a named defendant in this lawsuit, has a residence address listed at 10629 W. Chisholm Ct., Sun City, Arizona 85258.
4. On November 10<sup>th</sup>, Affiant contacted an Arizona process server to attempt service on Universal Hospitality Solutions, LLC by serving Scott Nadel as a member at 10629 W. Chisholm Ct. in Sun City, Arizona.
5. On November 17<sup>th</sup>, the Arizona process server attempted to serve Scott Nadel as a Member of Universal Hospitality Solutions, LLC at 10629 W. Chisholm Ct., Sun City, Arizona. A female answered the door and informed the server that Scott Nadel no longer resided at the address and now resides in California.
6. On November 18<sup>th</sup>, Affiant was advised by the Arizona server that Scott Nadel, on information and belief, had moved to California. Affiant conducted a search on Scott Nadel in California and obtained an address of 15833 Independence Avenue., Lathrop, California 95330.
7. On November 22<sup>nd</sup>, Affiant contacted a California process server to attempt service on Universal Hospitality Solutions, LLC by personally serving Scott Nadel as a Member of, at 15833 Independence Avenue, Lathrop, California 95330.
8. On December 9<sup>th</sup> at 9:30 a.m., the California process server attempted to serve Universal Hospitality Solutions, LLC by personally serving Scott Nadel at 15833 Independence Avenue, Lathrop, California 95330. A male, who introduced himself as Roland S., answered the door and confirmed that Scott Nadel lived there however advised the server that Scott Nadel was not home at the present time.
9. On December 11<sup>th</sup> and December 14<sup>th</sup>, the California process server again attempted to serve Universal Hospitality Solutions, LLC by personally serving Scott Nadel at 15833 Independence Avenue, Lathrop, California. There was no answer at the door at each attempt.
10. On December 14<sup>th</sup>, Affiant was advised by the California process server that Universal Hospitality Solutions, LLC had not been served.

11. On December 14<sup>th</sup>, Affiant contacted the Arizona process server and requested service on Universal Hospitality Solutions, LLC by serving Member Scott Nadel at the business address of 7702 E Doubletree Ranch Rd., Suite 300, Scottsdale, Arizona.
12. On December 15<sup>th</sup>, the Arizona server attempted to serve Universal Hospitality Solutions, LLC by serving Scott Nadel at 7702 E Doubletree Ranch Rd., Suite 300 in Scottsdale Arizona. The desk receptionist stated that Scott Nadel does not have an actual office at the location but does have a mailbox.
13. On December 21<sup>st</sup>, the Arizona process server returned to 7702 E Doubletree Ranch Rd., Suite 300 to again attempt service on Universal Hospitality Solutions, LLC by serving Scott Nadel. A woman by the name of Kate, the GM, informed the server that all mail for Universal Hospitality Solutions, LLC and Scott Nadel is forwarded to Scott Nadel via Fed Ex to 15833 Independence Avenue, Lathrop, CA 95330.
14. On December 22<sup>nd</sup>, Affiant was advised that Universal Hospitality Solutions, LLC had not been served.
15. We have no further alternative location information for Defendant Universal Hospitality Solutions, LLC after diligent inquiry and attempts and believe that 7702 E Doubletree Ranch Rd., Suite 300, Scottsdale, Arizona 85258 is a current and valid address for Scott Nadel and Universal Hospitality Solutions, LLC. It is also believed that 15833 Independence Avenue, in Lathrop, California 95330 is a current and valid address for Scott Nadel, Member of Universal Hospitality Solutions, LLC. It is further believed that Scott Nadel, Member of as well as a named defendant in this lawsuit, may be aware of this lawsuit and through his attorney, agents, employees or relatives, Scott Nadel, as Member of Universal Hospitality Solutions, LLC is attempting to evade service in this manner.

January 4, 2022

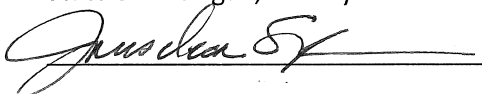


Cynthia R. Lee  
RECON Management Group, LLC  
30400 Telegraph Rd. #472  
Bingham Farms, MI 48025

Subscribed to and sworn before me on

JANUARY 4, 2022 in the

State of Michigan, County of Oakland



Notary Public

**James Dean Schoenherr**  
Notary Public, State of Michigan,  
County of Macomb  
My Commission expires Jan 12, 2024  
Acting in the County of OAKLAND

# EXHIBIT B



Connell Foley LLP  
One Newark Center  
1085 Raymond Blvd., 19th Floor  
Newark, New Jersey 07102  
P 973.436.5800 F 973.436.5801

**Bryan P. Couch**  
Partner  
Direct Dial 973-436-5703  
BCouch@connellfoley.com

January 5, 2022

***VIA REGULAR AND CERTIFIED MAIL, RETURN RECEIPT REQUESTED***

Universal Hospitality Solutions, LLC  
c/o Scott Nadel  
7702 East Doubletree Ranch Road, Suite 300  
Scottsdale, AZ 85258

Universal Hospitality Solutions, LLC  
c/o Scott Nadel  
15833 Independence Avenue  
Lathrop, CA 95330

**Re: Wingate Inns International, Inc. v. Universal Hospitality Solutions, LLC et al.;**  
**Civil Action No: 2:21-cv-19809-KM-AME**  
**Site No. WII 54619**

Dear Mr. Nadel:

We represent plaintiff, Wingate Inns International, Inc., in the above-referenced matter. Enclosed for service upon you as member of defendant Universal Hospitality Solutions, LLC are a Complaint and Summons filed in the United States District Court for the District of New Jersey on November 5, 2021.

Please be guided accordingly.

Very truly yours,

Bryan P. Couch

BPC/mal  
Enclosures

Roseland

Jersey City

Newark

New York

Cherry Hill

Philadelphia

[www.connellfoley.com](http://www.connellfoley.com)